



Canadian Food Inspection Agency
Agence canadienne d'inspection des aliments

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Ms. Sally Stratmoen
Chief, Equivalence Section
International Policy Staff
Office of Policy, Program Development
And Evaluation
USDA/FSIS
Washington, D.C. 20250

Dear Ms Stratmoen:

I am writing in response to the "2001 Audit report for Canada" received from your office. I would like to thank you on behalf of the Canadian Food Inspection Agency (CFIA) for this opportunity to comment on USDA's review of our Canadian Meat Poultry and Egg Products Inspection Systems.

The CFIA generally agrees with the audit report. We were happy to read that: "In all nine establishments visited, both CFIA inspection controls and establishment system controls were in place to prevent, detect, and control contamination and adulteration". As indicated in your audit report, most of the deficiencies observed were immediately corrected. I can also confirm that those concerns left outstanding at the end of the audit have all been corrected. We would however like to offer the following comments:

1. One of the "minor variations" observed concerning our Sanitation Standard Operating Procedure (SSOP) program was that preventive action was not recorded in the establishment SSOP program. We would submit that it is not always possible to predict the appropriate preventive measures in a SSOP program. It is rather more efficient to include them as an integral part of a corrective action, in other words, if a deviation occurs, the establishment operator is expected to take appropriate corrective action, analyze the situation and implement a preventive measure, where applicable. This is already fully documented in the Food Safety Enhancement Program (FSEP) Implementation manuals and more specifically in the sanitation prerequisite program and Volume 4 of FSEP. You can find all pertinent details on CFIA's Website at <http://www.inspection.gc.ca/english/ppc/paps/haccp/manu/vol2/3e.shtml>.

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2. In regard to the denaturing and identification of condemned carcasses and product, CFIA's Meat Inspection Programs have clear requirements that are fully in line with Food Safety Inspection Service's (FSIS) requirements. A memorandum to all staff has been sent out to remind all staff to ensure that the National Program is systematically followed.
3. Regarding the pre-shipment review, the FSEP program was officially submitted to your office for equivalence determination as a result of FSIS implementing the mandatory HACCP : Pathogen Reduction rule. Your office then reviewed the FSEP and recognized it as equivalent to the US rule. The FSEP does not include a pre-shipment review as a mandatory step.

We believe that CFIA has a different but equivalent way to achieve the same food safety objective. The review of HACCP records is done during the verification step but not necessarily pre-shipment. Canada's FSEP requirements, combined with CFIA's legal authority to mandate a recall if need be, is achieving the same results, thus achieving an acceptable level of protection in accordance with FSIS requirements.

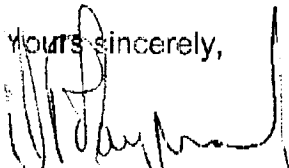
4. Regarding monthly reviews, there has been an unfortunate misunderstanding. Canada has a requirement for conducting quarterly reviews of meat and poultry establishments. This requirement has been appearing in our Meat Hygiene Manual of Procedures (MOP) (Chapter 1) for many years and has always been available on CFIA's website as a public document. FSIS routinely receives copies of all amendments to our MOP.

In the past, we considered any comment from auditors in that regard as a "deviation" from FSIS requirements but equivalent as an outcome. In a telephone conversation between CFIA, your staff and the USDA/FSIS Technical Center staff, it was established that supervisory visits were being done in Canada at least as frequently as implemented in the USA. As a result, we considered this activity as "Equivalent".

5. Finally, the report indicates that there was a concern about Canada's lack of authority to prevent convicted felons from operating a certified establishment. The whole Canadian Meat Inspection System, including the legislative mandates, the economic fraud and the compliance risk areas were reviewed in 1992 and the report noted some minor differences but concluded overall, that the Canadian meat and poultry inspection system was equivalent to the U.S. inspection system. Since then, nothing has changed regarding the aspect of legislative mandate and compliance particularly in regard of convicted felons. We are not sure why this is an issue.

Thank you for the opportunity to comment your draft audit report.

Yours sincerely,



M.F. Baker
Director
Food of Animal Origin Division

c.c. Dr. R. Charlebois, A/National Manager, Meat Programs, FAOD